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VIA ECF

June 28, 2021

The Hon. Alison J. Nathan
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Re: Lodging Solutions, LLC d/b/a Accommodations Plus, Intl. v. Miller et al., 19-cv-10806-AJN – Joint Letter Motion for Temporary Stay

Dear Judge Nathan,

Since the Court's entry of the Case Management Order on March 1, 2021, Plaintiff Lodging Solutions, LLC and Defendants FleetCor Technologies, Inc., Travelliance, Inc., Corporate Lodging Consultants, Inc., and Robert Miller have agreed to engage in a process of formal mediation. In order to facilitate the parties' agreed upon pursuit of out of court resolution of this case, and in light of the impending discovery deadlines, the parties jointly request that the Court enter a stay of this action (including, without limitation, all discovery and any applicable procedural deadlines) up through and including Tuesday, December 22, 2021.

Additionally, prior to any entry of a Stay by the Court, the parties also jointly request that the Court extend the fact and expert discovery periods, and other case-related deadlines established by the March 1, 2021 Scheduling Order (Dkt. No. 107), as follows:



Deadline	Existing Date	New Date
Interrogatory Cutoff	April 9, 2021	February 1, 2022
Fact Discovery Cutoff	July 2, 2021	March 22, 2022
Completion of Depositions	June 30, 2021	March 1, 2022
Requests to Admit Cutoff	June 5, 2021	March 8, 2022
Expert Discovery Cutoff	August 16, 2021	May 6, 2022

No prior requests for adjournment or extension of time pertaining to discovery have been made by either party. A proposed Revised Scheduling Order is attached to this request pursuant to the Court's Individual Rules. Granting the requested stay will not prejudice either party.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Robert M. Stern

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Consultants, Inc. and Robert M. Miller*

This action is stayed through December 22, 2021. The parties should file a status report on that date and should inform the Court if they desire a referral to the District's mediation program or the assigned Magistrate Judge for settlement, or if there is anything else the Court can do to assist the parties with settlement. The Court will not grant any further discovery extensions.
SO ORDERED.

A handwritten signature in black ink, reading "Alison J. Nathan", enclosed within a black rectangular border.

SO ORDERED. 6/30/2021
ALISON J. NATHAN, U.S.D.J.